## EXHIBIT 131 REDACTED

## In the Matter Of:

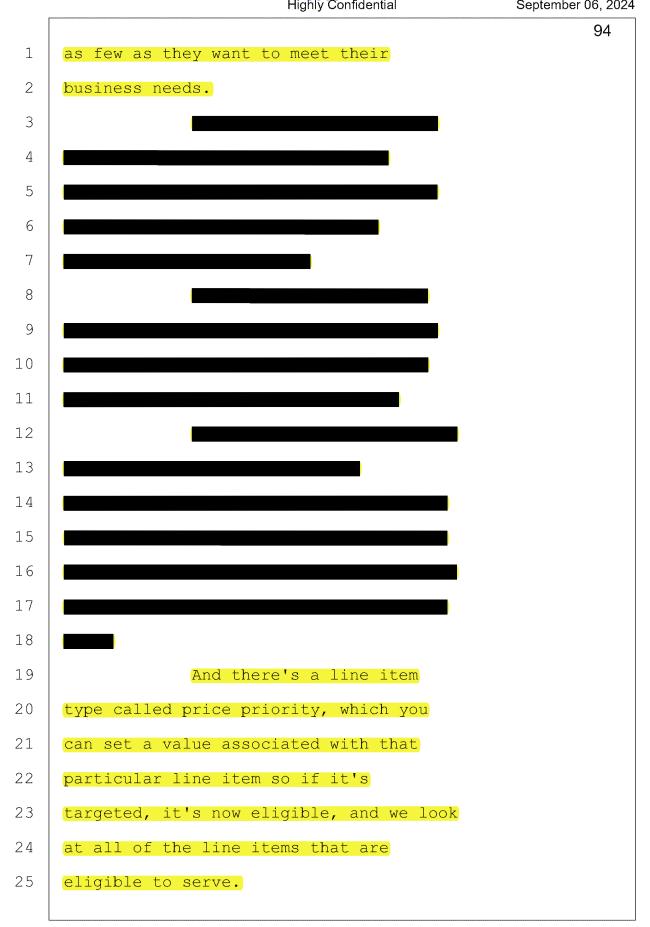
In Re - Google Digital Advertising Antitrust Litigation

September 06, 2024



1	IN THE UNITED STATES DISTRICT COURT
2	FOR THE SOUTHERN DISTRICT OF NEW YORK
3	
4	TNI DE . COOCIE DICIMAL . CIVIL ACMION
5	IN RE: GOOGLE DIGITAL: CIVIL ACTION ADVERTISING ANTITRUST: NO. LITIGATION: 21-MD-3010-
6	: PKC
7	· - HIGHLY CONFIDENTIAL -
8	- HIGHEL CONFIDENTIAL -
9	
10	September 6, 2024
11	
12	Videotaped deposition of taken pursuant to notice,
13	was held at the law offices of
14	Freshfields Bruckhaus Deringer, 3 World Trade Center, New York, New York,
15	beginning at 9:35 a.m., on the above date, before Michelle L. Ridgway, a
16	Registered Professional Reporter, Certified Shorthand Reporter, Certified
17	Realtime Reporter, Certified Court Reporter, and Notary Public.
18	
19	
20	
21	
22	
23	
24	
25	

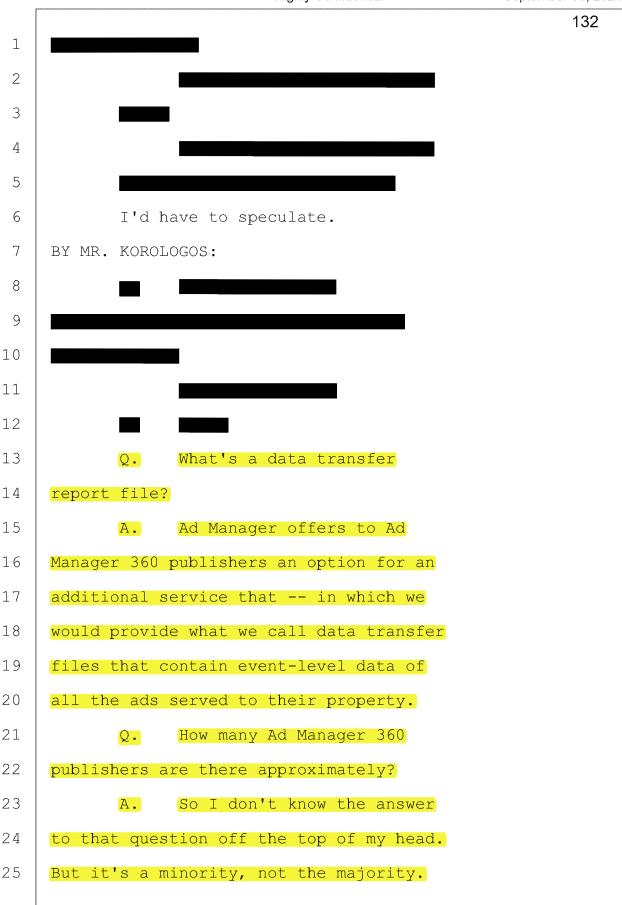
1



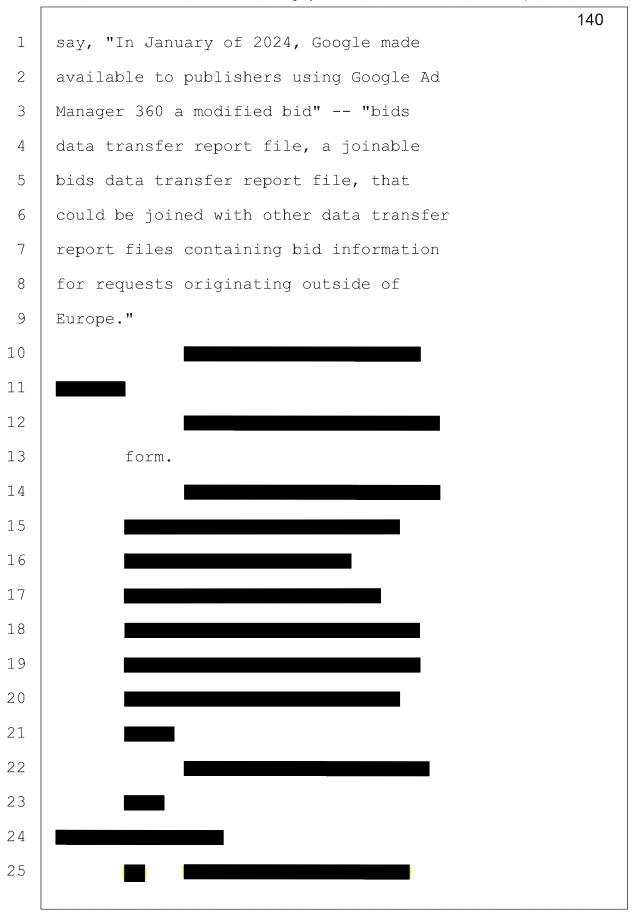
```
95
 1
                  And from a price priority
 2
    perspective, we take the highest price
 3
     of all the line items that are targeted.
 4
                  So line item limits have
 5
    been around since the very beginning of
 6
     Ad Manager. And we need limits.
 7
                  And to be clear, these are
 8
     active line item limits. You can create
 9
     a million line items in our system. But
10
     only 65,000 can be active at a time,
11
    because we then take all of those line
12
     items and move them into serving in a
13
    low-latency cache, where I can target
14
     them and use the information and serving
15
     time.
16
                  The more line items we have
17
     to marshal into serving, the higher the
18
    resource costs. And we have to actually
19
     do budgeting ahead of time to make sure
20
     we've adequately provisioned all of our
21
     data centers to provision all of the
22
     complex targeting that would then be
23
    live, and it requires more when you have
24
     more line items.
25
                  So that's what a line item
```

```
96
 1
    limit is, to sort of make sure that
 2
    we -- you know, a publisher doesn't
 3
    arbitrarily make a set of changes that
 4
    blow past our ability to serve ads for
 5
    all of our publishers using our system.
 6
                  Some publishers using
 7
    header bidding decided that they want to
 8
    have fairly complex setups with very
 9
    fine granularity where they modeled out
10
    their system and they said, I need more
11
    than 65,000 line items.
12
                  So this -- what is a line
13
    item limit, a header bidding line item
14
    limit? It's a limit on the number of
15
    line items. It's not specific to header
16
    bidding. It's been around since the
17
    beginning of DFP. It predates me by a
18
    long shot. And it's a limit that's
19
    there to ensure that our systems scale
20
    effectively and one publisher doesn't
21
    bring down the whole system.
22
            Q.
                  And you mentioned that line
23
     item limits have been around as long as
24
     Ad Manager. But they predated Ad
25
    Manager as well, correct?
```





September 06, 2024



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## HIGHLY CONFIDENTIAL ERRATA SHEET FOR THE TRANSCRIPT OF:

Case Name: In re Google Digital Advertising Antitrust Litigation, 1:21-md-03010 (PKC)

Deposition Date: September 6, 2024

Deponent:

## **CORRECTIONS**

Page	Line	Change	Reason
11	22		Transcription Error
18	8	The phrase "ad to be" should read "ad be"	Transcription Error
29	24	The phrase "We" should read "We'd"	Transcription Error
56	16		Transcription Error
65	7		Transcription Error
72	25		Transcription Error
73	20		Transcription Error
81	3		Transcription Error
89	8		Transcription Error
91	12		Transcription Error
92	24	The phrase "and header" should read "and the header"	Transcription Error
104	23	The phrase "typically embedded" should read "typically embedded directly"	Transcription Error
111	2	The phrase "ala" should read "a la"	Transcription Error
111	12	The phrase "That wasn't" should read "No, that wasn't"	Transcription Error
118	14	The phrase "out of the database" should read "out of a database"	Transcription Error
127	24		Transcription Error
132	23	The phrase "So I don't" should read "I don't"	Transcription Error
134	16		Transcription Error
134	20		Transcription Error
138	24		Transcription Error
139	13		Transcription Error
145	14		Transcription Error
146	21		Transcription Error
150	23		Transcription Error

Page	Line	Change	Reason
163	20		Transcription Error
165	1	The phrase "ala" should read "a la"	Transcription Error
165	5	The phrase "ala" should read "a la"	Transcription Error

I have inspected and read my deposition and have listed all changes and corrections above, along with my reasons therefore.

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Date: October 4, 2024 Signatur